

EXHIBIT Q

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

**DECLARATION OF JASON E. LUCKASEVIC IN SUPPORT OF CO-LEAD CLASS
COUNSEL'S PETITION FOR AN AWARD OF ATTORNEY'S FEES AND
REIMBURSEMENT OF COSTS AND EXPENSES**

JASON E. LUCKASEVIC declares as follows pursuant to 28 U.S.C. § 1746:

1. I am Jason E. Luckasevic of the law firm of Goldberg, Persky & White, P.C. I submit this declaration in support of Co-Lead Class Counsel's Petition for an Award of Attorney's Fees and Reimbursement of Costs and Expenses in connection with and for services rendered and expenses incurred for the common benefit of the Settlement Class in the above-captioned multidistrict litigation ("Action") from the inception of the MDL litigation through July 15, 2016, as well as for the payment of expenses incurred therewith. Future discussions on

pre MDL will occur at a later date per Co-Lead Counsel. I have personal knowledge of the matters set forth in this declaration and, if called upon, I could and would testify competently thereto.

2. I am a Shareholder of the law firm of Goldberg, Persky & White, P.C. and was the lawyer who originated the “NFL Concussion Litigation” when I filed the first two cases of its kind. My firm’s efforts were critical to the investigation of groundbreaking facts, creation of liability against the league and litigating of the case up to and including the arguments on the NFL’s Motions to Dismiss. Our efforts were in conjunction with Executive Committee member, Tom Girardi, and his law firm of Girardi Keese.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of common benefit time spent by the attorneys and professional support staff of my firm who were involved in, and billed fifty or more hours to, this Action, and the lodestar calculation for those individuals based on my firm’s current billing rates. The schedule was prepared from firm records, data and attestations regularly prepared and maintained by my firm. Time expended in preparing this application for attorney’s fees and expenses has been excluded.

4. The hourly rates for the attorneys of my firm included in Exhibit 1 are the same as they charge for non-contingent work that is paid on an hourly basis, or for rates paid to attorneys of comparable experience and reputation in the relevant legal market which have been accepted by Federal Courts related to my law firm.

5. The total number of hours expended on the common benefit of this Action by my firm during the time period is 500.6 hours. The total lodestar for my firm is \$262,860.00, which is all attorney time.

6. My firm's lodestar figures are based solely upon my firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

7. As detailed in Exhibit 2 hereto, my firm is seeking reimbursement of a total of \$11,823.78 in common benefit expenses incurred in connection with the prosecution of this Action. These expenses are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source material, and are an accurate record of the expenses incurred.

8. With respect to the standing of my firm to share in an award of fees, costs, and expenses, attached hereto as Exhibit 3 is a description of my firm, including the attorneys in my firm who were principally involved in this Action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 9, 2017, at Pittsburgh, Pennsylvania.

s/ Jason E. Luckasevic

Jason E. Luckasevic
Goldberg, Persky & White, P.C.
11 Stanwix Street, Suite 1800
Pittsburgh, PA 15222
(412) 471-3980

EXHIBIT 1

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

GOLDBERG, PERSKY & WHITE, P.C.

EXHIBIT #1

LODESTAR REPORT

MDL Inception through July 15, 2016

NAME	HOURS	HOURLY RATE	AMOUNT
PARTNERS:			
Jason E. Luckasevic	243.5	\$600.00	\$146,100.00
Jason T. Shipp	74.1	\$600.00	\$44,460.00
Diana N. Jacobs	87.0	\$500.00	\$43,500.00
ASSOCIATES			
Mike Elmer	96.0	\$300.00	\$28,800.00
TOTALS:	500.6	See above	\$262,860.00

EXHIBIT 2

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

Goldberg, Persky & White, P.C.

EXHIBIT #2

COST AND EXPENSE REPORT

MDL Inception through July 15, 2016

NUMBER	CATEGORY	AMOUNT
1	Assessments	
2	Commercial Copies	
3	Computerized Research	
4	Court Reporters/Transcripts	
5	Expert Services	\$4,631.26
6	Facsimile	
7	Filing & Service Fees	
8	In-House Copies	
9	Long Distance Telephone	
10	Postage/Express Delivery	
11	Travel/Meals/Lodging	\$7,192.53
12	Miscellaneous	
TOTAL EXPENSES		\$11,823.78

EXHIBIT 3

**IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY
LITIGATION**

No. 12-md-2323-AB

GOLDBERG, PERSKY & WHITE, P.C.

EXHIBIT #3

Goldberg, Persky & White, P.C. ("GPW") is a law firm headquartered in Pittsburgh, Pennsylvania that has successfully represented tens of thousands of injury victims in various civil actions for over 30 years. With over 20 lawyers and nearly 100 employees, our firm has offices and practices in the tristate area as well as Michigan.

In late 2006, Associate Attorney Jason Luckasevic, licensed in Pennsylvania, Michigan and Arizona, began his investigation of rampant problem of chronic brain injuries and deaths of former National Football League players through his personal relationship with Dr. Bennet Omalu, who uncovered the disease Chronic Traumatic Encephalopathy ("CTE") in former players.

To get this massive case off the ground and into a courtroom took years of time and expense. The work included investigating the science of head injuries, reading and reviewing scientific journals, examining the NFL corporate structure, as well as analyzing rule changes, injury reports and the creation and proceedings of NFL committees. The work of these committees often ran counter to the actual science of brain injuries in athletes. Thereafter, Mr. Luckasevic studied the causation of CTE by speaking with the leading experts in the field of medicine and interviewing hundreds of former players and their families. Next, he and GPW developed the legal analysis that developed the critical claims of negligence and fraud against the NFL. These theories were alleged by Mr. Luckasevic and GPW in the first two lawsuits ever filed in relation to CTE against the NFL and Riddell on behalf of over 120 former players. All of this effort, it is understood, will be considered at a later date per Co-Lead Counsel.

Concerning the MDL litigation, GPW's efforts were critical to supporting Executive Committee member, Tom Girardi and his law firm. Our efforts uncovered the critical "gap years" that were the key argument at the Motion to Dismiss hearing. Further, our efforts were critical to the creation of the master complaint, short form complaint, arguments in the Motion to Dismiss and media relations publicity matters.

Along the way, Jason Luckasevic was promoted to a Shareholder of GPW in 2008 after practicing for 8 years. He was provided assistance from fellow Shareholders Jason Shipp, licensed since 2001, Diana Jacobs, licensed since 1994, and Associate Attorney Mike Elmer.